

HON. JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ERWIN SINGH BRAICH,

Plaintiff,

STEVE MITTELSTAEDT; KEITH M.
OLSON; THE CITY OF BELLINGHAM;
TYLER LETEY; SHREE SHARMA;
DEBORAH BORTNER; THE STATE OF
WASHINGTON; BRIAN G. McLEAN;
McLEAN & ARMSTRONG; ROBERT
RUSKO; DAVID WOOD; KPMG, INC.;
KPMG LLP; RCMP SARGEANT TIM
ALDER; THE GOVERNMENT OF
CANADA; and JOHN/JANE DOES 1-10,

Defendants.

NO. 2:07-cv-00177-JCC

**GOVERNMENT OF CANADA AND
RCMP TIM ALDER'S NOTICE OF
SOVEREIGN IMMUNITY AND
SUGGESTION OF PRIOR FOREIGN
BANKRUPTCY CASE**

TO THE: PLAINTIFF;
AND TO: ALL COUNSEL OF RECORD.

PLEASE TAKE NOTICE that the above-named Defendants, THE GOVERNMENT
OF CANADA and RCMP SARGEANT TIM ALDER, hereby assert their complete immunity
from suit herein under The Foreign Sovereign Immunities Act 28 U.S.C. § 1602, et seq.

NOTICE OF SOVEREIGN IMMUNITY AND
SUGGESTION OF PRIOR FOREIGN PROCEEDING - 1
NO. 2:07-cv-00177-JCC

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1 PLEASE TAKE FURTHER NOTICE of a prior foreign bankruptcy case, in the Matter of
2 the Bankruptcy of Erwin Singh Braich, No. 193466VA99, which was pending before the Supreme
3 Court of British Columbia, Canada when the above-captioned case was filed.
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5 The above notice is given in advance of motion for dismissal, or other responsive pleading,
6 by The Government of Canada and RCMP Tim Alder on the basis of sovereign immunity, and
7 such other grounds as may be asserted therein.
8

9 DATED this 16th day of May, 2007.

10 HACKER & WILLIG, INC., P.S.
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12 By: /s/ Donald E. Hacker, Jr.
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19 Attorneys for Defendants,
20 The Government of Canada and RCMP
21 Sargeant Tim Alder
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